

Exhibit B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM,

Plaintiff,

v.

LISA REYNOLDS-BARBOUNIS,

Defendant.

Civil Action No.: 19-5697

**DECLARATION OF SETH CARSON IN SUPPORT OF COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND LITIGATION EXPENSES**

I Seth Carson declare as follows:

1. I am an attorney that was admitted to the Pennsylvania Bar in 2014.
2. I have been lead counsel in well over 200 lawsuits.
3. Every year for the past 3 years I have been voted a Pennsylvania Rising Star by the Super Lawyers platform.
4. I acted as lead counsel in the instant matter since the case was filed to its conclusions where I secured a jury verdict for my client on all counts.
5. Based on my experience and practicing law in Pennsylvania, I charged an hourly rate of \$500.00 per hour for this case.
6. Since before the instant matter was filed I represented Lisa Barbounis and tried to resolve this matter without the need for litigation.
7. I was directly involved in all aspects of this lawsuit from beginning to end.
8. I spent at least 1700 working on the instant matter. This includes reviewing all the discovery which was approximately half a million documents.

9. My bill for legal services rendered is $(1700 \text{ hours}) * (\$500.00) = \$850,000$.

10. I swear to the above under penalty of perjury.

A handwritten signature in black ink, appearing to read "Seth D. Carson". The signature is fluid and cursive, with the first name "Seth" being more prominent and the last name "Carson" following in a similar style.

Seth D. Carson
December 30, 2021